



AMENDMENT

Rainey Generating Station
Post Office Box 70
Iva, SC 29655-0070
(864) 352-6110

October 10, 2007

Linda Daugherty
Director, Southern Region
PHMSA
233 Peachtree Street, Ste. 600
Atlanta, GA 30303

Re: **CPF 2-2007-1016M**

Dear Linda,

In response to the "Notice of Amendment" dated September 12, 2007 regarding apparent procedure inadequacies found during an inspection on April 30 – May 2, 2007, Santee Cooper has chosen **not** to contest the findings, but to amend our procedures as follows:

1. To be in compliance with 49 CFR Part 192.627, we have added procedure 40.102 "Tapping Under Pressure" to the Santee Cooper O&M Manual.
2. To be in compliance with 49 CFR Part 192.727, we have added procedure 30.115 "Abandonment of Natural Gas Pipeline" to the Santee Cooper O&M Manual.

Enclosed are written copies of the procedures. These procedures have been reviewed by members of your office. Electronic copies are available. We would prefer to send them via electronic mail.

You may contact me or Emory Connelly for any additional information:

Joseph D. Thorndyke
Station Manager
jdthornd@santeecooper.com
(864) 352-6110 ext 2902

Emory Connelly
Principal Engineer
ejconnel@santeecooper.com
(864) 352-6110 ext 2907

Sincerely,

Joseph D. Thorndyke
Station Manager
Santee Cooper Rainey Generating Station

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Enclosure: *Procedure 40.102 "Tapping Under Pressure"*
Procedure 30.115 "Abandonment of Natural Gas Pipeline"

Gas Pipeline Operating Procedures Manual

DATE ISSUED/REVISED Rev. 10/04/2007	TAPPING UNDER PRESSURE	NUMBER 40.102
SECTION WELDING		PAGE 1 of 2

1.0 PURPOSE

This procedure outlines requirements for tapping the natural gas transmission line under pressure (hot tapping) and contributes to compliance with 49 CFR Part 192.627.

2.0 RESPONSIBILITY

Station Manager, Maintenance Superintendent

3.0 GENERAL

- 3.1 Only qualified contractors are permitted to make taps under pressure to Santee Coopers natural gas pipeline.
- 3.2 All "tapping under pressure" procedures must be in accordance with the latest editions of the following standards; API 2201 and/or ASME B31.8.
- 3.3 Each tapping procedure to be used must be recorded in detail and submitted to Santee Cooper management for approval prior to start of work. This record must be retained and followed whenever the procedure is used.
- 3.4 Any and all welding that is part of the "tapping under pressure" process must comply with Procedure 40.101 "Welding and Welder Qualifications" in this manual. Qualified contract welders may weld on pressurized natural gas pipelines at the discretion of Santee Cooper management.

4.0 PROCEDURE

Tapping Under Pressure Qualification

- 4.1 Only qualified contractors shall be allowed to tap the pipeline under pressure.
- 4.2 To assure that only qualified contractors perform tapping tasks on Santee Coopers natural gas pipeline, the following measures will be taken:
 - The contractor shall submit references of past work history to Santee Cooper management.
 - The contractor shall submit all tapping procedures to be used to Santee Cooper management.
 - Santee Cooper management shall be responsible for assuring that the above requirements are met for all work.

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Gas Pipeline Operating Procedures Manual

DATE ISSUED/REVISED Rev. 10/04/2007	TAPPING UNDER PRESSURE	NUMBER 40.102
SECTION WELDING		PAGE 2 of 2

Tapping Procedures

- 4.3 Perform all tapping in accordance with tapping procedures qualified to produce taps meeting the applicable acceptance standards.

Tapping procedure qualification

- 4.4 Engineering or designated representative will determine the scope of each procedure and the necessary qualifications.
- 4.5 Procedure qualification shall be in accordance with API 2201 and/or ASME B31.8.

8.0 RECORDS

- 8.1 Complete and retain tapping qualification records for future reference.
- 8.2 Record in detail and retain tapping procedure qualifications for as long as the tapping procedure is in use.
- 8.3 Tapping procedure qualification records supporting the procedures shall be retained by Santee Cooper.

Gas Pipeline Operations & Maintenance Manual

DATE ISSUED/REVISED Rev. 10/04/2007	ABANDONMENT OF NATURAL GAS PIPELINE	NUMBER 30.115
SECTION PIPELINE		PAGE 1 of 1

1.0 PURPOSE

This procedure establishes requirements for abandonment of any natural gas pipeline segment. It contributes to compliance with DOT 49 CFR 192.727.

2.0 RESPONSIBILITY

Santee Cooper Management and Station Operations

3.0 GENERAL

- 3.1 This procedure assumes that the natural gas pipeline has been removed from service per procedure 30.107 "Removing Pipeline From Service".
- 3.2 Abandonment of the natural gas pipeline or any segment there of shall be conducted in accordance with DOT 49 CFR 192.727.

4.0 PROCEDURE

- 4.1 Develop a plan with detail and contents adequate for the pipeline or the particular pipeline segment and situation involved.
- 4.2 Disconnect the pipeline and/or the pipeline segment from all sources and supplies of gas.
- 4.3 Purge the pipeline and/or the pipeline segment per procedure 30.108 "Pipeline Purging Methods".
- 4.4 Install pipe caps on both ends of the pipeline or the pipeline segment.

5.0 RECORDS

- 5.1 Establish a file for retaining records of pipeline abandonments.
- 5.2 Show the abandoned pipe or segment of the pipe on the system map.